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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. § 952(a) and 960)

ALIZAH HENRY,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Edward Gonzalez, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about June 6, 2015, within the Eastern District of New York and elsewhere, the defendant ALIZAH HENRY, did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and belief are as follows:<sup>1</sup>

1. On or about June 6, 2015, the defendant ALIZAH HENRY, a citizen of the United States, arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard Caribbean Airlines Flight 524 from Port of Spain, Trinidad.

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<sup>1</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. The defendant was selected for a Customs and Border Protection (“CBP”) examination. The defendant presented a black Atlantica suitcase and a grey Perry Ellis Portfolio suitcase for inspection.

3. A search of the black Atlantica suitcase revealed four white plastic bags labeled “Champion Baking Powder,” which contained a white powdery substance, along with clothing and personal items. A CBP Officer probed one of the plastic bags, which gave off a strong odor. The defendant was then taken to a separate search room where the white powdery substance field-tested positive for the presence of cocaine.

4. A search of the defendant’s grey Perry Ellis Portfolio suitcase revealed four additional bags of “Champion Baking Powder.” The substance inside the bags also field-tested positive for the presence of cocaine.


5. The total approximate gross weight of the cocaine recovered was 10,086.2 grams.

6. After she was placed under arrest, the defendant was read her Miranda rights, which she appeared to understand and voluntarily waive. The defendant stated in sum and substance and in part that: (a) she had been living in Guyana for approximately three years and that her father, who lives in Guyana, agreed to purchase a ticket for her to return to the United States if she carried something to the United States for him; (b) her father provided her with the suitcases she brought into the United States and that he had packed the suitcases for her; (c) her father’s friend took a picture of her in Guyana; and (d) her father told her that, after arriving at JFK, she should take the bags he provided to her to the Holiday Inn closest to JFK, where she would be met by another individual who would recognize her from the picture. The defendant further stated in substance and in part that her father told her

that the person meeting her at the Holiday Inn would take something from her luggage, give her money, and that she was to send her father the money via Western Union. The defendant also stated that she knew her father previously had been deported from the United States for a crime involving drugs and that he told her she was carrying diamonds for him, and that they would be concealed somewhere in her luggage.

WHEREFORE, your deponent respectfully requests that the defendant ALIZAH HENRY be dealt with according to law.

Dated: Brooklyn, New York  
June 8, 2015

  
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EDWARD GONZALEZ  
Special Agent  
United States Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
8th day of June, 2015

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THE HONORABLE MARILYN D. GO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK